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July 28, 2021

Via ECF and Email

Hon. Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York, 11201

Re: *U.S. v. Ruslan Maratovich Asainov*
19 Cr. 402 (NGG)

Dear Judge Garaufis:

I write to respectfully request an adjournment of the trial date in this case.

The undersigned is lead counsel in the trial of *U.S. v. Ronald Washington*, 20 Cr. 305 (LDH), which is scheduled to begin on February 20, 2023. Trying these two labor intensive cases back-to-back, where both defendants are detained, would be a disservice to my clients. In *Washington*, the government anticipates that its case-in-chief should take approximately two to three weeks.

So that I may properly prepare both trials, I respectfully ask that your Honor adjourn Mr. Asainov's trial to a date convenient to the Court, after April 2023. The government has declined to share its position on our request for an adjournment

Mr. Asainov consents to the exclusion of time under the Speedy Trial Act. See, Title 18, United States Code, §3161(h)(7)(A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial, because it will allow counsel to properly prepare for trial.

Your Honor's attention to this matter is greatly appreciated.

Respectfully submitted,

Susan G. Kellman
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cc: Ruslan Asainov